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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OFFER OF
PROOF WITH RESPECT TO
WAYMO'S DEVELOPMENT
EXPENSES (DKT. 2530)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
6 to File Under Seal Its Offer of Proof with Respect to Waymo's Development Expenses
7 (Dkt. 2530).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Offer of Proof	Blue highlights on page 6
Nardinelli Exhibit 3	Entire Document
Nardinelli Exhibit 4	Entire Document

15 3. The blue highlights on page 6 lines 1-3 of the Offer of Proof, as well as the
16 entirety of Nardinelli Exhibit 3, contain highly confidential information regarding technical
17 development goals of Uber's self-driving car program. This information is maintained as highly
18 confidential. I understand that disclosure of this information could allow competitors and
19 counterparties to gain insight into how Uber formulates various technical development goals of its
20 self-driving car program, as well as how Uber prioritizes these technical goals in the context of
21 their existing technology, allowing competitors to tailor their own technical development to the
22 detriment of Uber.

23 4. The blue highlights on page 6 lines 4-5 of the Offer of Proof, as well as the
24 entirety of Nardinelli Exhibit 4, contain highly confidential information regarding Uber
25 engineers' technical testing plan for a LiDAR sensor, revealing the development team's priorities
26 and evaluation strategy. This information has been maintained as highly confidential. I
27 understand that disclosure of this information could allow competitors and counterparties to gain
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1 insight into Uber's testing plan and goals for LiDAR, which would allow competitors to tailor
2 their own technical development to the detriment of Uber.

3 5. Defendants' request to seal is narrowly tailored to the portions of Waymo's Offer
4 of Proof and supporting exhibits that merit sealing.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this
6 30th day of January, 2018 at San Francisco, California.

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8 /s/ Thomas J. Pardini
9 Thomas J. Pardini
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